

## EXHIBIT C

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**From:** Ellis, Abram J  
**Sent:** Friday, November 3, 2023 7:15 AM  
**To:** Ehrenkrantz, Joe; Logie, Jamie C.; Guryan, Peter  
**Cc:** Obaro, Bambo; Ryan, Liz; Taylor, Robert  
**Subject:** RE: PulsePoint, Inc.'s Objections and Response to IQVIA Subpoena

Joe,

Your correspondence on confidentiality issues continue to be insufficient under the Amended Protective Order. As but one example, your email below appears to dramatically overstate the materials that are the subject of your pending motion and your request to share confidential information with your client. Although we do not have the FTC's preliminary injunction motion or the expert report, I have to assume that neither of those submissions actually cites the **entirety** of the Gerszke IH transcript or the **entirety** of the Gerszke deposition transcript. Yet your email below does not contain or reflect any precise citations. Thus, we really have no basis to respond to your request.

Similarly, while at least conceivable that the FTC's preliminary injunction motion and the FTC's expert cited the entirety of the Garcia declaration (dated August 16, 2023), the entirety of the Garcia letter (dated April 24) or the entirety of PulsePoint's transaction data, we do not know whether that is the case because you have not precisely identified the portions of those materials that were actually cited by the FTC or the FTC's expert.

In addition, it could not possibly be useful for in-house counsel at IQVIA to have visibility of portions of the Gerszke IH hearing transcript and the Gerszke deposition transcript relating to, for example, Mr. Gerszke's educational background (March 22, 2023 Investigative Hearing Transcript ("3/22 IH Tr.") at 10:5-18), employment history (3/22 IH Tr. at 10:19-25, 11:1-25, and 12:1-5), and his role and responsibilities at Internet Brands (3/22 IH Tr. at 12:6-24). We do not have a copy of the 'Deposition of Konrad Gerszke, Transcript' so are not in a position to provide similar citations, but we would be happy to do that once given the opportunity to designate the deposition transcript.

To be clear: we view IQVIA's reluctance to share these precise details – perhaps even your intentional omission of these details – as potential evidence that IQVIA is not truly engaged in good faith discussions on these topics. PulsePoint has been and remains open to discussing in good faith portions of PulsePoint's confidential information that can be shared with in-house counsel, but you have not provided any real justification for why PulsePoint's confidential information is relevant to the litigation strategy.

Best,

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Abram Ellis  
Simpson Thacher & Bartlett LLP  
900 G Street, N.W.  
Washington, D.C. 20001

O: +1-202-636-5579  
M: +1-734-780-6923  
aellis@stblaw.com

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**From:** Ehrenkrantz, Joe <Joseph.Ehrenkrantz@weil.com>  
**Sent:** Wednesday, November 1, 2023 4:13 PM  
**To:** Logie, Jamie C. <Jamie.Logie@stblaw.com>; Ellis, Abram J <AEllis@stblaw.com>; Guryan, Peter <Peter.Guryan@stblaw.com>  
**Cc:** Obaro, Bambo <Bambo.Obaro@weil.com>; Ryan, Liz <Liz.Ryan@weil.com>; Taylor, Robert <Robert.Taylor@weil.com>  
**Subject:** RE: PulsePoint, Inc.'s Objections and Response to IQVIA Subpoena

\*\*\* External Email \*\*\*

Hi Jamie, Abram, Peter

We're in receipt of your letters dated October 26 and November 1, 2023, and we disagree that our notice letter dated October 23, 2023 was invalid, as you have suggested. Nonetheless, we take PulsePoint's confidentiality concerns seriously and we will agree to identify the information PulsePoint has designated Confidential that the FTC cited in its Preliminary Injunction Motion and its expert report, as you requested. In order to make informed decisions in defense of the litigation, it is essential for IQVIA's in-house counsel to have visibility into the testimony and factual support that the FTC is relying on in prosecuting its case, including the below information PulsePoint has designated Confidential.

Below is the list of documents and testimony that PulsePoint designated Confidential that the FTC cited in its Preliminary Injunction Motion and expert report. We're available to meet and confer to discuss this matter to the extent it would be helpful to do so:

- Investigative Hearing of Konrad Gerske, Transcript
- Deposition of Konrad Gerske, Transcript
- Declaration of Susan Garcia (PulsePoint), August 16, 2023
- Letter from Sue Garcia to Samuel Fulliton, "RE: Proposed Acquisition of Propel Media, Inc., by IQVIA Holdings Inc., File No. 221-0196," April 24, 2023
- PulsePoint, "Highly Confidential – Transaction Data.xlsx"

Please let us know if you would like to discuss.

Thank you.  
Joe



**Joseph Ehrenkrantz**  
Associate  
Pronouns: He/him/his

Weil, Gotshal & Manges LLP  
2001 M Street NW, Suite 600  
Washington, DC 20036  
[Joseph.Ehrenkrantz@weil.com](mailto:Joseph.Ehrenkrantz@weil.com)  
+1 202 682 7271 Direct  
+1 202 857 0940 Fax